

Sprint

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June 16, 2005

Chairman Pat Miller
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, Tennessee 37243

Re: Response to Request for PUC Directive and Motion to Consolidate Docket No. 05-00156 with Docket No. 05-00152

Dear Chairman Miller:

United Telephone-Southeast, Inc. ("Sprint") is in receipt of a letter filed by The Information Bureau, Inc. ("TIB") on June 3, 2005. The letter alleges, among other things, that Sprint has without appropriate legal basis discontinued the provisioning of UNE ISDN-PRI services to TIB. This is not an accurate description of the situation with this CLEC. However, instead of reciting the grounds for Sprint's position in this letter, Sprint wishes to refer the Tennessee Regulatory Authority ("Authority") the May 27, 2005 Petition for Declaratory Ruling filed in Docket No. 05-00152 by Sprint. This filing sets forth the basis for Sprint's actions as it relates to TIB. Therefore, Sprint respectfully requests that the Authority accept the positions set forth in that filing as a response to TIB's "Request for PUC Directive."

Since the issues raised by both Sprint and TIB in Docket Nos. 05-00152 and 05-00156 arise from the same course of dealings between the parties (e.g. an interconnection agreement entered into by the parties on November 1, 2002) and the release the Federal Communications Commission's Triennial Review Order in CC Docket 01-338, it seems most appropriate to consolidate these matters into one docket. Therefore, under cover of this letter, Sprint is enclosing an original and thirteen copies of its Motion to Consolidate for the Authority's consideration. Please do not hesitate to contact me if you have any questions concerning this matter.

Sincerely yours,



Edward Phillips

Enclosures

BEFORE THE TENNESSEE REGULATORY AUTHORITY
NASHVILLE, TENNESSEE

In the Matters of:)	
)	
Petition by United Telephone-Southeast, Inc.)	Docket No. 05-00152
for Declaratory Ruling by the Tennessee)	
Regulatory Authority)	
)	
and)	
)	
Petition by The Information Bureau, Inc.)	Docket No. 05-00156
for Request for PUC Directive)	
)	

Motion of United Telephone-Southeast, Inc. to Consolidate
Docket No. 05-00156 with Docket No. 05-00152

United Telephone-Southeast, Inc. ("Sprint") through its undersigned counsel and pursuant to Tenn. Comp. R. & Regs. 1220-1-2-.06 moves the Tennessee Regulatory Authority ("Authority") for consolidation of Docket No. 05-00156 with Docket No. 05-00152. As grounds for its motion, Sprint states as follows:

1. On May 27, 2005, Sprint filed its Petition for Declaratory Ruling (Petition) in Docket No. 05-00152 as a result of a course of dealings arising from its expired November 1,

2002 *Master Interconnection and Resale Agreement for the State of Tennessee* it had entered into with The Information Bureau, Inc. ("TIB").¹

2. On June 3, 2005, TIB filed what it has called its "Request for PUC Directive" with the Authority. This filing requests that the Authority issue an order requiring Sprint to provide TIB ISDN-PRI services at UNE rates. Sprint's Petition for Declaratory Ruling requests that the Authority declare that Sprint has no legal obligation to continue to provide ISDN-PRI services at UNE rates. With this in mind, it is obvious that the two matters are in fact related and arise from the same set of circumstances surrounding the interconnection agreement between the parties and the issuance of the Federal Communications Commission's ("FCC's") Triennial Review Order. See: *In the Matter of Review of the Section 251 Unbundling Obligations of Incumbent Local Exchange Carriers*, CC Docket No. 01-338 (FCC 04-179).

3. Since the two dockets discussed above arise from the same legal issue, the matters should be consolidated into one docket.

4. The consolidation of these matters will serve the purposes of judicial economy and promote the efficient use of resources of the Authority and the parties. Moreover, the due process rights of the parties are also protected by consolidation as the parties will have the ability to set forth their positions and legal argument in the context of a consolidated docket that considers the legal issue arising from this parties' course of dealings and subsequent FCC determinations.

WHEREFORE, based on the foregoing, Sprint respectfully requests that the Authority order consolidation of Docket No. 05-00156 with Docket No. 05-00152 as it serves the ends of

¹ TIB applied for certification as a competitive facilities-based provider on July 11, 2002. The Authority granted TIB's request for certification, after conducting a hearing, in its order entered in Docket No. 02-00774 on October 23, 2002.

judicial economy, promotes the efficient use of resources and protects the due process rights of the parties.

Respectfully submitted this 16th day of June, 2005.

A handwritten signature in cursive script, reading "Edward Phillips", is written over a horizontal line.

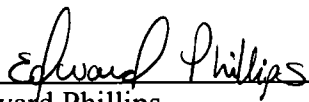
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CERTIFICATE OF SERVICE

I hereby certify that I have served a copy of the foregoing Petition of United Telephone-Southeast, Inc. upon Kirti Bajwa by depositing a copy in the United States Mail, first-class postage prepaid.

This 16th day of June, 2005.

Kirti S. Bajwa, President
The Information Bureau, Inc.
113 S. Church Street
P. O. Box 49
Mountain City, TN 37683



Edward Phillips
United Telephone-Southeast, Inc.